

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, and Jon Fitch, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Lead Case No.: 2:15-cv-01045 RFB-(PAL)

Consolidated Case Nos.:

2:15-cv-01046-RFB-(PAL)

2:15-cv-01055-RFB-(PAL)

2:15-cv-01056-RFB-(PAL)

2:15-cv-0157-RFB-(PAL)

**[PROPOSED] ORDER APPOINTING
INTERIM CO-LEAD COUNSEL AND
LIAISON COUNSEL**

And Related Consolidated Cases

1. Pursuant to Federal Rule of Civil Procedure 23(g)(3), the Court hereby appoints the following counsel as Plaintiffs' Interim Co-Lead Class Counsel: Berger & Montague, P.C.; Cohen Milstein Sellers & Toll PLLC; Joseph Saveri Law Firm, Inc, and following firm as Liaison Counsel: Wolf, Rifkin, Shapiro, Schulman & Rabkin, LLP.

2. Plaintiffs' Interim Co-Lead Class Counsel shall be responsible for performing work to advance the litigation for the common benefit of all plaintiffs and proposed class members, including all plaintiffs and proposed class members in related actions subsequently filed in or transferred to this District (collectively, "Plaintiffs"). Plaintiffs' Interim Co-Lead Class Counsel's responsibilities for coordinating and organizing Plaintiffs in the conduct of this litigation shall:

- a. Organize and conduct pretrial law and motion practice, including class certification;
- b. Organize and conduct discovery, including the conduct of all discovery on behalf of Plaintiffs consistent with Fed. R. Civ. Pro 26;
- c. Act as spokesperson at pretrial conferences;
- d. Enter into stipulations with opposing counsel, as necessary, for the conduct of litigation;
- e. Consult with and retain experts, as necessary;

- f. Conduct trial and post-trial proceedings;
- g. Act as spokesperson at pretrial conferences;
- h. Enter into stipulations with opposing counsel, as necessary, for the conduct of the litigation;
- i. Encourage cooperation and efficiency among all Plaintiffs' counsel;
- j. Call meetings of Plaintiffs' counsel, when appropriate;
- k. Make all work assignments to Plaintiffs' counsel;
- l. Monitor the activities of all Plaintiffs' counsel to ensure that the litigation is conducted effectively, orderly, efficiently, and economically;
- m. Ensure that schedules are met, and that unnecessary, duplicative, or unproductive expenditures of time and expense are avoided; and
- n. Negotiate with defense counsel with respect to settlement and other matters, if and as appropriate.

3. Plaintiffs' Interim Co-Lead Counsel shall also be the contact between Plaintiffs' counsel and counsel for the Defendant, as well as the spokespersons for Plaintiffs' counsel, including Plaintiffs' counsel in related actions subsequently filed in or transferred to this District.

4. No motion, request for discovery, or other pretrial proceedings shall be initiated or filed by any Plaintiff except through Interim Co-Lead Counsel.

IT IS SO ORDERED.

Dated:

HON. RICHARD F. BOULWARE, II
United States District Judge